

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

UNITED STATES OF AMERICA	)	No.
	)	
v.	)	Violation: Title 18, United States
	)	Code, Section 1623(a)
JOHN RESA	)	

The SPECIAL AUGUST 2006-2 GRAND JURY charges:

1. At times material to this indictment:

a. Formed in or about the early 1990s, the Hispanic Democratic Organization (“HDO”) was a political organization with hundreds of individual participants, many of whom were City of Chicago employees. One of the leaders and principal organizers of HDO was Individual A, a high-ranking City of Chicago (“City”) official.

b. HDO supported political candidates in a variety of campaigns, including City aldermanic, City mayoral, Illinois state representative, Illinois state senate, suburban Chicago, statewide and federal campaigns. For the individual candidates selected to receive HDO support (“HDO-selected candidates”), typically, individual HDO participants performed voter outreach efforts on behalf of the HDO-selected candidate. The voter outreach efforts (otherwise known as “field” activities) included, among other efforts, registering voters, obtaining signatures from registered voters on nominating petitions, delivering campaign literature door-to-door, soliciting City service requests from potential voters during canvassing efforts, and providing election-day assistance.

c. In addition to these field efforts, participants in HDO were solicited to

make financial contributions to support HDO and also to support HDO-selected candidates.

d. Operationally, HDO was divided into three geographic divisions, generally known as HDO North, HDO South and HDO Southeast. During its peak years of operation, from the mid 1990s through approximately 2004, HDO Southeast had as many as 500 individual participants who performed political work on behalf of one or more HDO-selected candidates (the “individual HDO participants”). During these years, the head of HDO Southeast was Individual A. Assisting Individual A in coordinating HDO Southeast activities was Individual B, a City employee and a close associate of Individual A.

e. Generally, in HDO Southeast, the specific political directives, whether related to field work activities or fundraising efforts, were disseminated through a hierarchical system. That is, Individual A, typically through Individual B, informed “Political Coordinators,” each of whom directed certain individual HDO participants, as to the particular political assignments. Typically, these directives were given to the Political Coordinators during HDO Southeast meetings. Once the particular political directive was given, Political Coordinators disseminated the information to their “captains,” each of whom was responsible for directing individual HDO participants, and to other individual HDO participants within the Political Coordinator’s group.

f. Within HDO Southeast, from the mid 1990s to approximately 2004, there were approximately six to eight Political Coordinators who received direction from Individual A or Individual B in support of the particular HDO-selected candidate.

g. During the period from approximately the mid 1990s to 2004, individual

HDO participants were told by various HDO leaders, including Individual B and certain Political Coordinators, that requests for City job-related benefits (e.g., jobs, promotions, overtime, transfers) for individual HDO participants be made through the individual's Political Coordinator, and that such benefits would be sought for those who actively participated in the campaigns of HDO-selected candidates.

h. During the period from approximately the mid 1990s to 2004, individual HDO participants made requests for City job-related benefits to Political Coordinators, Individual A and Individual B, among others. Such requests included requests for a) entry-level City jobs; b) promotions to other City positions; c) increased overtime opportunities; d) transfers to more desirable work locations; e) pay increases and other job-related benefits. On many occasions, individual HDO participants received those City job-related benefits through the actions of high-ranking City officials.

2. Beginning in or about 1994 through the present, defendant JOHN RESA was an employee of the City and, from approximately 1994 to approximately early 2005, was an HDO Southeast Political Coordinator. During his tenure as a Political Coordinator, RESA was responsible for coordinating, overseeing and managing the political activities of as many as 70 individual HDO participants, the largest of the sub-groups of HDO Southeast. During his tenure as Political Coordinator, RESA reported to Individual B, and on occasions, Individual A.

3. The SPECIAL AUGUST 2006-2 GRAND JURY was conducting an investigation into possible violations of federal criminal law in connection with hiring and

promotion fraud at the City, including the awarding of City job-related benefits, through a rigged interview process, in exchange for political activity on behalf of political organizations such as HDO. As it related to HDO Southeast, the following matters, among others, were material to the investigation:

- a. Whether Political Coordinators advocated, promoted, or attempted to procure City job-related benefits on behalf of individual HDO participants;
- b. Whether Political Coordinators took any steps to advance or support City job-related requests made to them by individual HDO participants;
- c. Whether Political Coordinators had any communications with Individual A or Individual B regarding City job-related requests relating to individual HDO participants;
- d. Whether Individual A or Individual B had any role in supporting job-related requests made on behalf of individual HDO participants; and
- e. Whether HDO employed any system or process by which individual HDO participants could request or obtain City job-related benefits through Political Coordinators in conjunction with their political activities for HDO-selected candidates.

4. On or about October 19, 2006, a letter of immunity was issued to RESA, requiring his “complete, truthful and accurate” testimony before the SPECIAL AUGUST 2006-2 GRAND JURY. Pursuant to the letter of immunity, defendant testified before the SPECIAL AUGUST 2006-2 GRAND JURY on October 19, 2006. The letter explicitly informed RESA that in the event that the United States Attorney’s Office determined that RESA had violated any provision of the letter of immunity or failed to give complete,

accurate and truthful information and testimony, then, among other things, all statements RESA made would be admissible in evidence against him in a prosecution for perjury or false statement, and in any and all other criminal proceedings hereafter brought against RESA. On or about October 19, 2006, RESA, who was represented by an attorney, signed the immunity letter and acknowledged its terms.

5. On or about October 19, 2006, at Chicago, in the Northern District of Illinois, Eastern Division,

JOHN RESA,

defendant herein, was placed under oath before testifying and was advised that his testimony was subject to the penalties of perjury before the SPECIAL AUGUST 2006-2 GRAND JURY; and knowingly made false material declarations by stating, in substance, the following:

Q: Did you ever talk to [Individual B] or [Individual A] about a job-related request that any of these [individual HDO participants]..., any request that they had, did you ever pass that on orally to [Individual B] or [Individual A]?

A: No.

Q: Never once?

A: Never once.

\* \* \* \*

Q: So your testimony here under oath is that you might have told [the individual HDO participants that you had passed on their job-related request], but in fact you never did?

A: Right.

Q: Tell us sir, what's the point of that?

A: To keep them going. Excuse my French, bullshit them—to keep them coming to campaigns. Once you tell them they ain't nothing in there, they're going to take off on you. And a lot of people come and go, and

to keep them around, you got to tell them what they want to hear. And that's how you kept—I'm a salesman, and that's what I do. So I sell myself to them just like they sell themselves for a candidate.

Q: So you lied?

A: Yes.

Q: A lot?

A: Yes.

Q: Okay, so you routinely told them that you were trying to assist them in employment, but you never once did?

A: Yeah.

\* \* \* \*

Q: My question, sir, is did you ever —your testimony under oath is you never once, never once, for any of these [individual HDO participants], actually went to [Individual B] or [Individual A] ...and tried to assist them in getting a job or a promotion or an overtime benefit, anything at all?

A: No.

Q: But you are also telling this Grand Jury that you routinely told them that

you were doing such things—

A: Yeah.

Q: —and that was all a lie—

A: Yes.

Q: —to keep them coming in—

A: Right.

Q: —because you're a salesman?

A: Right.

\* \* \* \*

Q: You also understood that a number of your people received career service motor truck driver jobs over the years, correct?

A: Correct.

Q: And its also your testimony that however they got it, it had absolutely nothing to do with anything you did on their behalf?

A: Correct.

WHEREAS, in truth and fact, as defendant JOHN RESA then well knew:

a. On multiple occasions during his tenure as Political Coordinator, RESA talked with Individual A or Individual B about job-related requests of individual HDO participants;

b. On multiple occasions during his tenure as Political Coordinator, RESA passed on job-related requests of individual HDO participants to Individual A or Individual B;

c. On multiple occasions during his tenure as Political Coordinator, RESA went to Individual A or Individual B and tried to assist individual HDO participants in obtaining job-related benefits; and

d. On multiple occasions during his tenure as Political Coordinator, RESA made efforts on behalf of individual HDO participants in employment related matters with the City, including jobs for career service motor truck driver, among other positions.

In violation of Title 18, United States Code, Section 1623(a).

A TRUE BILL:

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FOREPERSON

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UNITED STATES ATTORNEY